

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

ROBERT HUBBLE, *on behalf of himself
and all others similarly situated,*

Case No. 1:24-CV-11173-TLL-PTM

Plaintiff,

v.

LOANDEPOT.COM, LLC,

Defendant.

_____ /

**DECLARATION OF ROD HALPERIN IN SUPPORT OF DEFENDANT
LOANDEPOT.COM, LLC'S OPPOSITION TO PLAINTIFF'S MOTION FOR A
PROTECTIVE ORDER**

I, Rod Halperin, declare:

1. I am over the age of eighteen (18) years. I submit this declaration in support of Defendant loanDepot.com, LLC's (hereinafter "loanDepot") Opposition to Plaintiff's Motion for a Protective Order. The matters set forth below are based upon my personal knowledge and, if called to testify as a witness, I could and would competently testify thereto.

2. I am a Vice President of loanDepot.com, LLC ("loanDepot").

3. loanDepot provides lending to consumers across the United States.

4. loanDepot provides information regarding its loans to consumers in a number of ways. Pertinent to this case, it will make outbound calls to consumers but only when consumers have provided prior express written consent to receive calls from loanDepot.

5. Consumers can provide prior express written consent to loanDepot directly or through third-parties. In this case, on or about March 27, 2024, loanDepot received the Plaintiff's phone number (989) 240-2316 in connection with an online request made on <https://27.mysupersamples.com>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 14th day of November 2024 in Irvine, CA.

Signed by:

7852B71EDB0E48B...
Rod Halperin

CERTIFICATE OF SERVICE

I hereby certify that on November 14, I electronically sent the foregoing to counsel of record for the Plaintiff.

/s/ Brittany A. Andres
Brittany A. Andres